

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA**

IN RE: CHARDAE TAYLOR, : CHAPTER 13
Debtor. :
: CASE NO. 23-12561 (MDC) :
: Hearing: 04/25/24 at 9:30 a.m.
: Telephonic Courtroom #2

OBJECTION OF DEBTOR TO CHAPTER 13 TRUSTEE MOTION TO DISMISS

Chardae Taylor, the Debtor (the “Debtor”) in the above captioned matter, by and through her undersigned counsel responds to the Motion of the Chapter 13 Trustee, (the “Trustee”) and states the following:

1. Admitted.

2. Admitted.

3. Denied for the following reasons: (1) domestic support obligation (“DSO”) was uploaded to the trustee document site on 3/11/24; (2) NDO was uploaded to the trustee document site on 10/17/23; (3) debtor does not own a vehicle; (4) crowdfunding statement was uploaded on 4/8/24; (5) income statements were filed on the court docket via ECF on 11/2/23 at docket number 21.

4. Debtor plans to amend Schedules, A, B, C, I, J and Plan prior to the next hearing on this matter.

WHEREFORE, the Debtor requests the Court deny the relief sought by the Chapter 13, pending the Debtor’s revisions of the proposals set forth in paragraph #4, above.

RESPECTFULLY SUBMITTED,
/s/ Maggie S. Soboleski
Counsel for the Debtor